

BEFORE THE POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

**Modification of Mail Classification
Schedule Regarding Forever
Print-on-Demand Indicia**

Docket No. MC2012-10

COMMENTS OF PITNEY BOWES INC.

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Pitney Bowes Inc. (Pitney Bowes) respectfully submits these comments in support of the Postal Service's proposed classification change related to Forever Print-on-Demand indicia.

On March 22, 2012, the Postal Service filed a notice with the Commission pursuant to 39 C.F.R. §§ 3020.90 and 3020.91 concerning a classification change related to Forever Print-on-Demand Indicia.¹ The Postal Service proposes to expand the definition of Forever stamps in the Mail Classification Schedule (MCS) to include Forever Print-on-Demand indicia. *See* Notice at 1.

The Postal Service seeks the classification change to accommodate the sale of Forever Print-on-Demand Indicia through its Automated Postal Centers (APCs). *See id.* Specifically, the Postal Service proposes to make available through its APCs "a customer-specified quantity of postage indicia, containing a barcode, an image selected by the customer from a few postal-owned images, and the word 'Forever.'" *Id.* The Print-on-Demand indicia will be sold at the then-current price of a First-Class Mail single-ounce letter, and, like Forever stamps, will carry the value of First-Class Mail single-ounce letter postage at the time of mailing. *See id.* The Postal Service explains that by having the kiosks print Forever Print-on-Demand Indicia labels it will no longer have to stock its APCs with Forever stamps. *See id.*

The Forever Stamp was initially approved by the Commission because of its potential to be "both convenient for mailers and economical for the Postal Service" *See* PRC Dkt. No. R2006-1, Op. and Rec. Dec. (Feb. 26, 2007) at ¶ 5275. This proposal realizes both of those aims. It would promote consumer access and convenience while allowing the Postal Service to leverage technology in a way that will further reduce its costs. Recent mail volume trends for

¹ *See* Notice of the United States Postal Service of Classification Change Related to Forever Print-on-Demand Indicia, March 22, 2012 (Notice).

Single-Piece First-Class Mail underscore the importance of making consumer access more convenient and retail sales more cost efficient.

The Notice discusses the availability of Forever Print-on-Demand indicia through Postal Service APCs, but the same benefits would accrue to mailers by offering Forever Print-on-Demand indicia through other alternate retail access channels, including postage meters, PC postage, self-service kiosks, and customized postage. The requested MCS language should make clear that the new definition could encompass other applications for the Forever Print-on-Demand indicia. A minor change to the Postal Service's proposed MCS language is recommended as follows:

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GLOSSARY OF TERMS AND CONDITIONS

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Forever Stamps/Indicia

Forever stamps and Forever Print-on-Demand indicia are sold at the prevailing price for single-piece letters, first ounce, in First-Class Mail. Once purchased, Forever stamps and Forever Print-on-Demand indicia may be used for postage equal to the prevailing price, at the time of use, for single-piece letters, first ounce, in First-Class Mail. Forever stamps and Forever Print-on-Demand indicia are intended for the prepayment of postage for the first ounce of First-Class Mail single-piece letter mail, and otherwise may be used for the prepayment of postage. Forever Print-on-Demand indicia is a form of postage ~~offered by the Postal Service~~, consisting of images aligned with indicia of postage payment.

The language “offered by the Postal Service,” (bolded, strike-through) in the last sentence of the proposed language should be deleted as unnecessary and because it could be read to limit the availability of Forever Print-on-Demand indicia, thereby diminishing the value of the proposed classification change.

Subject to the changes discussed above, the Commission should approve the requested classification change.

Respectfully submitted:

/s/

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